



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

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OFFICE OF
ENVIRONMENTAL
CLEANUP

MAR 19 2015

Mr. Bob Wyatt
Chairman, Lower Willamette Group
c/o Northwest Natural
220 Northwest Second Avenue
Portland, Oregon 97209

Re: Portland Harbor Superfund Site, Administrative Order on Consent for Remedial Investigation and Feasibility Study; Docket No. CERCLA-10-2001-0240
Remedial Investigation Executive Summary

Dear Mr. Wyatt:

This letter is in response to the February 12, 2015 letter from the LWG providing comments on EPA's draft revisions to the Executive Summary to the Remedial Investigation report. As we discussed on March 11, 2015 at our senior manager/ project manager meeting, the EPA will consider these comments in revising the Executive Summary of the RI. This letter further describes the context for this decision and next steps with regard to this Summary.

The EPA provided its draft edits to the LWG on January 13, 2015. The LWG's comments were provided to the EPA on February 12, 2015. While there were conversations and correspondence between the LWG and EPA prior to February 12, 2015, there was no meeting to discuss LWG's issues with the EPA project manager with regard to those issues per our agreed upon process. In order to facilitate such discussion, LWG could have requested an extension which EPA has typically granted in this process. Instead, the LWG submitted the letter to EPA and raised these issues for senior manager resolution.

Per the September 24, 2014 agreed upon process for revising the FS, the LWG may only raise issues for senior manager resolution if they cannot be resolved at the project manager level. Since the LWG did not seek to resolve them at the project manager level, EPA will consider the LWG's comments and redrafted Executive Summary in making our final modifications. We will provide the final modifications to the Executive Summary concurrent with all other sections in our direction to the LWG to complete the RI report. Consistent with the process agreement, the LWG may raise a formal dispute on the Executive Summary within 30 days of EPA's direction.

Please note that in our last revisions, EPA edited the Executive Summary provided by the LWG in its 2011 draft final RI by removing redundant text and updating the remaining portions with information negotiated with the LWG in the revised sections of the RI; therefore, it is unclear why the LWG believes that the revised summary contains inaccurate information. Certain information regarding the human health risk assessment that the LWG claims is critical information to include in the summary will be considered by EPA senior managers for inclusion. Generally, the underlying risk assessment assumptions are presented in the BHHRA (Section 3), which is attached as an appendix to the final RI for those readers requiring additional context.

We are very happy that we are almost done with the RI revision process and that the LWG will soon be tasked to produce the final RI. If you have any questions regarding this letter, please contact me at (206) 553-6523, or by email at cohen.lori@epa.gov. You may also contact Cami Grandinetti at (206) 553-8696, or by email at grandinetti.cami@epa.gov.

Sincerely,



 Lori Cohen, Associated Director
Office of Environmental Cleanup

cc: Mr. Tom Gainer
Oregon Department of Environmental Quality

Mr. Rick Keppler
Oregon Department of Fish and Wildlife

Mr. Rob Neely
National Oceanic and Atmospheric Administration

Mr. Jeremy Buck
U.S. Fish and Wildlife Service, Department of Interior

Mr. Brian Cunningham
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Mr. Michael Karnosh
Confederated Tribes of the Grand Ronde Community of Oregon

Mr. Tom Downey
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Mr. Audie Huber
Confederated Tribes of the Umatilla Indian Reservation

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